

Before the
Federal Communications Commission
Washington DC 20554

In the Matter of
Proposal for Creation of the Low Power FM
(LPFM) Broadcast Service
Docket No. MM 99-25

1. Commercial vs. Non-commercial

The arguments to create LPFM as only non-commercial do not outweigh those to create LPFM as both. For 75 years radio stations have been selling advertising for operating income. LPFM stations need this option for survival and so do the small businesses in their target communities. These small businesses would greatly benefit from this new option because the cost to advertise on corporate stations is prohibitive.

2. 2nd and 3rd adjacent channel restrictions

Improvements in receiver design make it possible to drop the 2nd and 3rd adjacent channel restrictions. Another point supporting this the fact that hundreds of full power (grand fathered short spaced) FM stations have been operating for years with no interference complaints. If these stations do not cause interference neither will low power LPFM stations.

3. Use of a "prohibited contour overlap" method vs. "mileage separation tables"

The "prohibited contour overlap" method has been successfully used to predict interference in LPTV. And by using it for radio, many more LPFM stations could be created nationwide.

If the "mileage separation tables" are used instead as suggested in the NPRM than many major markets will not receive any LPFM stations. Unless the "prohibited contour overlap" method of processing and predicting interference is adopted than LPFM will not flourish thus making LPFM futile. LPFM must be available in all markets otherwise what is the point of its creation?

4. 60 meter limitation

In order to make LPFM viable and successful the 60 meter limitation on Class LP-1000 stations in the NPRM must be increased to 100 meters.

5. Ownership restrictions

The whole point of LPFM is to offer a variety of voices on the airwaves thus ownership restrictions must be created. The proposed "50 mile rule" suggested in RM- 9242 required an owner to live within 50 miles of the proposed antenna site. This is a perfect idea hindering corporations from buying up the LPFM stations.

A first come first served method would be a good method to incorporate as well. Second choice being auctions. However if this method is selected some form of bidding credits must be used in order to level the financial playing field. Credits ranging from 50% to 70% would probably be sufficient.

6. Primary and Secondary Status

Primary: Class LP - 1000 stations should include stations from 1000watts down to 200 watts.

Secondary: Class LP -100 stations should be designed to fit in where LP - 1000 stations won't fit.

Having a BA in Mass Communications-Broadcasting and a degree in RTF, I'm looking forward to the opportunity to put my education to use. My goal is to own and operate a low power commercial FM station in San Antonio. I believe that a station like the one I want would be a huge service to my community.

Thank you,

Amy Sue Herndon
4514 Diamondhead
San Antonio, Texas 78218

210-599-1592